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ESIS, INC., ACE AMERICAN INSURANCE
COMPANY

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

MARIA ABRAHIM,

Plaintiff,

v.

ESIS, INC., ACE AMERICAN
INSURANCE COMPANY,,

Defendants.

Case No. C07-4014 JCS

**DECLARATION OF DENISE CARSON IN
SUPPORT OF DEFENDANT ESIS, INC.
AND ACE AMERICAN INSURANCE
COMPANY'S REPLY TO PLAINTIFF'S
OPPOSITION TO MOTION TO COMPEL
ARBITRATION**

Date: February 1, 2008
Time: 9:30 a.m.
Judge: Judge Joseph Spero
Dept: Courtroom A, 15th Floor

I, DENISE CARSON, declare:

1. I submitted a declaration in support of Defendants' motion to compel arbitration of Plaintiff Maria Abraham's claims in this matter.

2. It has come to my attention that Plaintiff has objected to my declaration on the ground that it did not expressly state that I had personal knowledge of the matters discussed therein.

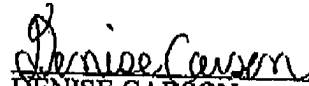
3. I thought the existence of my personal knowledge was made clearly by virtue of the fact that the matters I addressed were obviously within the scope of my job responsibilities as Assistant Vice-President and then Vice-President of Human Resources for ACE (and, before that,

(CASE NO. C07-4014 JCS)

**DEC OF DENISE CARSON ISO REPLY TO PLTF'S
OPP TO MOTION TO COMPEL ARB.**

1 Director of Employee Relations for CIGNA) and by the fact that my declaration, in some cases,
2 addressed actions I had personally taken. However, in order to ensure there is no confusion, I am
3 certifying that I do, in fact, have personal knowledge of all the facts, circumstances and events
4 described in the "DECLARATION OF DENISE CARSON IN SUPPORT OF DEFENDANTS
5 ESIS, INC., AND ACE AMERICAN INSURANCE COMPANY'S MOTION TO COMPEL
6 ARBITRATION," which was filed with the Court on December 14, 2007.

7 I declare under penalty of perjury under the laws of the United States that the
8 foregoing is true and correct to the best of my knowledge and that this Declaration was executed on
9 January 11, 2008, at Philadelphia, Pennsylvania.

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13 DENISE CARSON

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